



April 10, 2013

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Petition of USTelecom for Forbearance From Enforcement of Certain
Legacy Telecommunications Regulations, WC Docket No. 12-61

Dear Ms. Dortch:

This is to inform you that on April 8, 2013, representatives of USTelecom and its member companies met with Commission staff in connection with USTelecom's Forbearance Petition in this proceeding. The following industry representatives were in attendance at the meeting: Jeb Benedict, Tim Boucher and Melissa Newman of CenturyLink; Kathy Grillo, Ian Dillner and Chris Miller of Verizon; Robert Quinn, Christopher Heimann and Frank Simone of AT&T; Bennett Ross and Brett Shumate of Wiley Rein on behalf of USTelecom; and Glenn Reynolds of USTelecom. The following Commission staff were in attendance at the meeting: Julie Veach, Lisa Gelb, Deena Shetler, Bill Dever, and Jenny Prime of the Wireline Competition Bureau; Sean Lev, Rebekah Goodheart, Claude Aiken, Diane Griffin Holland, Douglas Klein, and Marcus Maher of the Office of General Counsel; and Michael Steffen of the Office of Chairman Genachowski.

During this meeting, the industry representatives urged that the Commission grant the forbearance relief requested in its petition filed on February 16, 2012, but focused their advocacy on the issues of the Commission's Part 32 accounting requirements, Continuing Property Records rules, and Long Distance Structural Separate Affiliate requirements.

With respect to the Commission's structural separations requirements which apply only to a relatively small subgroup of small and mid-sized incumbent local exchange carriers, USTelecom discussed its position that under existing precedent it is unnecessary for the Commission to undertake a market-by-market analysis before granting the requested relief. This discussion was consistent with the detailed analysis provided in our *ex parte* letter of March 28, 2013 in this docket.

With respect to the Commission's Part 32 and Continuing Property Records requirements, USTelecom asserted that there is no "current federal need" for these requirements, as the Commission would need to demonstrate in order to deny forbearance. USTelecom

emphasized that reliance upon speculative future needs for this information are insufficient and would effectively eviscerate the “current federal needs” standard. Moreover, it would be inconsistent with both the Administrative Procedures Act and the Paperwork Reduction Act for the Commission to rely upon uses for information other than those contemplated by the rulemakings that established a particular requirement in order to deny the requested relief.

Pursuant to Commission rules, please include this ex parte notice in the docket of the above-referenced proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Reynolds", with a stylized flourish at the end.

Glenn Reynolds
Vice President, Policy

c: Julie Veach
Lisa Gelb
Deena Shetler
Bill Dever
Jenny Prime
Sean Lev
Rebekah Goodheart
Claude Aiken
Diane Griffin Holland
Douglas Klein
Marcus Maher
Michael Steffen